



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 31 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Keith Pontow
Senior Associate Environmental Engineer
Global Brass and Copper Holdings, Inc. Metals
305 Lewis & Clark Blvd.
Zone 17 Casting Plant
East Alton, Illinois 62024

Re: Finding of Violation
Global Brass and Copper Holdings, Inc. Metals
East Alton, Illinois

Dear Mr. Pontow:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Global Brass and Copper Holdings, Inc. Metals (Olin Brass or you). The FOV is being issued under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). We find that you are in violation of the Clean Air Act, 42 U.S.C. § 7401 *et seq.*, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories, General Provisions, at 40 C.F.R. Part 63, Subpart A, and the NESHAP for Secondary Nonferrous Metals Processing Area Sources at 40 C.F.R. Part 63, Subpart TTTTTT, at your East Alton, Illinois facility.

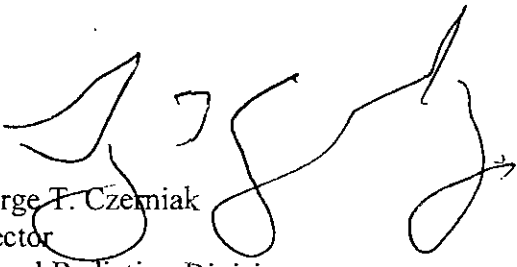
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you the opportunity to present information on the specific findings of violation, the efforts you have taken to comply, and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The technical contact in this matter is Kushal Som. You may contact him at (312) 353-5792 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely,



George T. Czerniak
Director
Air and Radiation Division

cc: Eric E. Jones
Manager
Bureau of Air, Compliance and Enforcement Section
Illinois Environmental Protection Agency

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Global Brass and Copper Holdings, Inc. Metals
305 Lewis & Clark Blvd.
Zone 17 Casting Plant
East Alton, Illinois 62024

FINDING OF VIOLATION

EPA-5-14-IL-08

Proceedings Pursuant to
Section 113(a)(1) of the
Clean Air Act, 42 U.S.C.
§ 7413(a)(1)

FINDING OF VIOLATION

The Environmental Protection Agency (EPA) is issuing this Finding of Violation under Section 113(a)(3) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(3). EPA finds that Global Brass and Copper Holdings, Inc. Metals (Olin Brass) in East Alton, Illinois, is in violation of the CAA, 42 U.S.C. § 7401 *et seq.*, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories, General Provisions, at 40 C.F.R. Part 63, Subpart A, and the NESHAP for Secondary Nonferrous Metals Processing Area Sources at C.F.R. Part 63, Subpart TTTTTT as follows:

Statutory and Regulatory Authority

1. The CAA, 42 U.S.C § 7401 *et seq.*, and the regulations promulgated thereunder, establish a statutory and regulatory scheme designed to protect and enhance the quality of the nation's air so as to promote the public health and welfare and the productive capacity of its population.

National Emission Standards for Hazardous Air Pollutants

2. Pursuant to Section 112 of the CAA, 42 U.S.C. § 7412, EPA promulgated the NESHAP for Source Categories, General Provisions, at 40 C.F.R. Part 63, Subpart A, §§ 63.1 through 63.16, with an effective date of March 16, 1994 (Fed. Reg. 12430).

3. Pursuant to Section 112 of the CAA, 42 U.S.C. § 7412, EPA promulgated the NESHAP for Secondary Nonferrous Metals Processing Area Sources at 40 C.F.R. Part 63, Subpart TTTTTT, with an effective date of December 26, 2007 (72 Fed. Reg. 73207).

4. The NESHAP at Subpart TTTTTT applies to owners or operators of a secondary nonferrous metals processing facility that is an area source of hazardous air pollutant emissions.

5. Under 40 C.F.R. § 63.11463(b), the “affected source” includes, among other things, all “furnace melting operations” located at any secondary nonferrous metal processing facilities.
6. Under 40 C.F.R. § 63.11472, a “furnace melting operation” includes a collection of processes used to charge post-consumer nonferrous scrap material to a furnace, melt the material, and transfer the molten material to a forming medium.
7. 40 C.F.R. § 63.11465 requires that emissions from each affected source are routed to a fabric filter or baghouse that achieves a particulate matter control efficiency of at least 99.0 percent or an outlet concentration of 0.034 grams per dry standard cubic meter (0.015 grains per dry standard cubic feet).
8. Table 1 to Subpart TTTTTT requires the owner or operator to comply with, among other things, the General Provisions of the NESHAP at 40 C.F.R. § 63.6(e)(1).
9. 40 C.F.R. § 63.6(e)(1) requires that at all times the owner or operator must operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.

Factual Background

10. Olin Brass owns and operates a secondary metals facility located at 305 Lewis & Clark Blvd in East Alton, Illinois (the Facility). The Facility includes eight melting operations: five Direct-Cast (DC) operations; two As-Cast (AC) and one continuous casting operation.
11. On October 24, 2013, an EPA inspector observed a representative DC melting operation. During the pouring operation (while burning charcoal), emissions were not routed to any control device.

Violations

12. Based upon the EPA inspector’s observations of uncontrolled emissions from metal pouring at its melting operations, Olin Brass failed to maintain and operate their furnaces at the Facility in a manner consistent with good air pollution control practice for minimizing emissions in violation of 40 C.F.R. § 63.6(e)(1).
13. Based upon the EPA inspector’s observations of uncontrolled emissions from metal pouring at its melting operations, Olin Brass failed to route its pouring emissions (while burning charcoal) to a fabric filter or baghouse that achieves a particulate matter control efficiency of at least 99.0 percent or an outlet concentration of 0.034 grams per dry standard cubic meter (0.015 grains per dry standard cubic feet), in violation of 40 C.F.R. § 63.11465.

Environmental Impact of Pollutants

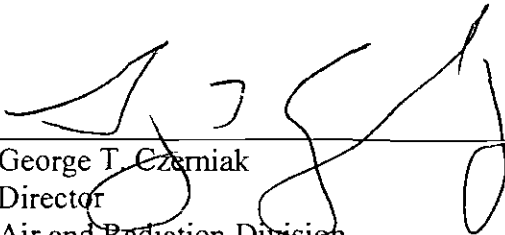
14. These violations have caused or can cause excess emissions of particulate matter.

Particulate Matter: Particulate matter, especially fine particulates contains microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. Particulate matter exposure contributes to:

- irritation of the airways, coughing, and difficulty breathing;
- decreased lung function;
- aggravated asthma;
- chronic bronchitis;
- irregular heartbeat;
- nonfatal heart attacks; and
- premature death in people with heart or lung disease.

Date

3/31/14


George T. Czerniak
Director
Air and Radiation Division

CERTIFICATE OF MAILING

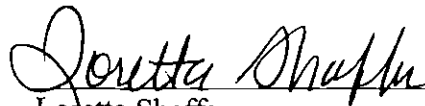
I, Loretta Shaffer, certify that I sent a Notice and Finding of Violation, No. EPA-5-14-IL-08, by Certified Mail, Return Receipt Requested, to:

Keith Pontow
Senior Associate Environmental Engineer
Global Brass and Copper Holdings, Inc. Metals
Olin Brass
305 Lewis & Clark Blvd.
Zone 17 Casting Plant
East Alton, Illinois 62024

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Eric Jones, Manager
Bureau of Air, Compliance Section
Illinois Environmental Protection Agency
P.O. Box 19506
Springfield, Illinois 62794

On the 2 day of April 2014.



Loretta Shaffer
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70091680 0000 7670 0757